

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

In re:)	
)	Chapter 13
Kerri Kaminski-Mintz,)	
)	Case No. 19-33019-JNP
Debtor)	
)	Bankruptcy Judge
)	Jerrold N. Poslusny, Jr.
)	

MOTION TO ADJOURN CREDITORS MEETING

PLEASE TAKE NOTICE that Creditor THURSTON LAW OFFICES LLC (“TLO”), by and through counsel, hereby respectfully moves this honorable Court to adjourn the §341 Creditors Meeting in the above-referenced matter for a period of two weeks to March 19, 2020. In support of its motion, TLO hereby states as follows:

1. On January 20, 2020, TLO filed its Amended Proof of Claim (Claims Register #1) in the amount of \$3,178.28.
2. Upon information and belief, TLO’s claim is the third largest claim against Debtor’s estate. (*See* Declaration of Robert C. Thurston, Esq. filed contemporaneously with this Motion,¹ ¶3.)

¹ Hereinafter “Decl. RCT”.

3. On February 12, 2020, TLO filed its Objection to Confirmation of the Chapter 13 Plan (ECF Doc #15) because its claim was neither included in the Schedules filed by Debtor nor in the Plan.

4. On February 19, 2020, TLO appeared through counsel at the first hearing on Confirmation of the Plan and voiced the nature of the objections to Trustee Isabel Balboa. At such time, counsel for the Debtor represented that she would contact undersigned counsel immediately to resolve the objection and ensure that TLO's interests as counsel for the debtor in numerous special education cases would be protected. Debtor's counsel was also advised that undersigned would not be available for a creditors' meeting during the week of March 2, 2020. To date, Debtor's counsel has not contacted TLO's counsel regarding these matters, despite the acknowledged urgency. (Decl. RCT, ¶4.)

5. This Court has scheduled the §341 Creditors Meeting for March 5, 2020. (*See* Docket.)

6. The Chapter 13 Plan Confirmation Hearing has been adjourned to April 1, 2020 (*see* Docket), so adjournment of the Creditors Meeting to March 19, 2020 would not impede that hearing.

7. TLO's counsel will be available to attend a Creditors Meeting on March 19, 2020. (Decl. RCT, ¶¶5-6.)

WHEREFORE, Creditor THURSTON LAW OFFICES LLC respectfully requests that this honorable Court adjourn the §341 Creditors Meeting in the above-referenced matter for a period of two weeks to March 19, 2020.

Dated: February 21, 2020

By: /s/ Robert C. Thurston
Robert C. Thurston, Esq.
Thurston Law Offices LLC
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Email: robert@thurstonlawpc.com

In Re:

Kerri J. Kaminski-Mintz

Case No.: 19-33019-JNP

Chapter: 13

Adv. No.:

Hearing Date: 04/01/2020

Judge: Jerrold N. Poslusny, J.

CERTIFICATION OF SERVICE

1. I, Robert C. Thurston :

☒ represent THURSTON LAW OFFICES LLC in this matter.

☐ am the secretary/paralegal for _____, who represents
_____ in this matter.

☐ am the _____ in this case and am representing myself.

2. On February 21, 2020, I sent a copy of the following pleadings and/or documents
to the parties listed in the chart below.

Motion to Adjourn Creditors Meeting and Declaration of Robert C. Thurston, Esq. in support

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: 02/21/2020

/s/ Robert C. Thurston

Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Kerri J. Kaminski-Mintz 115 Bradley Court Laurel Springs, NJ 08021	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Synthia L. McCarthy 115 Bradley Court Laurel Springs, NJ 08021	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Lee M. Perlman, Esq. 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>CM/ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
U.S. Trustee U.S. Dept. of Justice Office of the U.S. Trustee One Newark Center, Suite 2100 Newark, NJ 07102	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>CM/ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
Isabel C. Balboa, Trustee Cherry Tree Corporate Center 535 Route 38, Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>CM/ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable.)

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
All other parties of record	Counsel	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>CM/ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
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